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Of Attorneys for Defendants City of Eugene, Jairo Solorio,
Andrew Roberts, Jacob Thomas, Robert Griesel

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
(EUGENE DIVISION)

ANZHELIKA PAYNE, Personal
Representative to the Estate of
LANDON JAY PAYNE,

Case No. 6:22-cv-00471-MC

Plaintiff,

v.

**DECLARATION OF KIMBERLEE
MORROW IN SUPPORT OF
UNOPPOSED MOTION FOR
EXTENSION OF DEADLINES**

JAIRO SOLORIO, an individual, **ANDREW
ROBERTS**, an individual, **JACOB
THOMAS**, an individual, **ROBERT
GRIESEL**, an individual, **JUSTIN WILSON**,
an individual, **KIMBERLY FULTON**, an
individual, **EMMA EDWARDS**, an
individual, **COLTER GAWITH**, an
individual, **NATHAN GENT**, an individual,
MICHAEL BAEUERLEN, an individual,
STEPHEN FOLEY, an individual, **JOSEPH
FISHER**, an individual, **JEREMY FIFER**, an
individual, **WILLIAM MCCLURE**, an
individual, **LANCE JESTER**, an individual,
CLINT RILEY, an individual, **C. SANTINI**,
an individual, **LANE COUNTY**, and **CITY
OF EUGENE**, a municipal corporation,

Defendants.

I, Kimberlee C. Morrow, declare as follows:

1. I am an attorney for Defendant City of Eugene, Jairo Solorio, Andrew Roberts, Jacob Thomas, Robert Griesel. I make this declaration based on personal knowledge, except where stated herein.
2. The parties seek an extension of the deadline for the close of discovery to January 15, 2024, and the dispositive motion deadline to March 15, 2024.
3. The parties have been engaging diligently in document discovery and depositions, but given the breadth and complexity of issues and the numerous named parties, we have been unable to complete discovery within the current deadline. We are attempting to set the depositions of the plaintiff and several remaining parties, but given the conflicting schedules of counsel, we do not anticipate being able to complete the depositions prior to December.
7. All counsel has been contacted and join in this request for an extension.
8. The motion is made in good faith and not for any improper purpose or delay. I am unaware of any prejudice that will result to any party if the Court grants this motion.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 7th day of November, 2023.

HART WAGNER LLP

By: /s/ Kimberlee C. Morrow

Kimberlee C. Morrow, OSB No. 830280
kcm@hartwagner.com
Of Attorneys for Defendants City of Eugene,
Jairo Solorio, Andrew Roberts, Jacob
Thomas, Robert Griesel

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of November 2023, I served the foregoing

DECLARATION OF KIMBERLEE MORROW IN SUPPORT OF UNOPPOSED

MOTION FOR EXTENSION OF TIME on the following party at the following address:

Willow R. Hillman
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Of Attorneys for Plaintiff

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Of Attorneys for Lane County, Justin Wilson, Emma Edwards,
Colter Gawith, Nathan Gent, Michael Baeuerlen, Stephen
Foley, Joseph Fisher, Jeremy Fifer, William McClure, Lance
Jester, Clint Riley, C. Santini

by e-filing a true and correct copy thereof, certified by me as such.

/s/ Kimberlee C. Morrow

Kimberlee C. Morrow